

apparatus for monitoring road obstructions. Shimizu discloses a remote monitoring camera comprising a motion vector calculator for calculating a motion vector of a video image, and a motion vector direction detector for detecting the direction of the motion vector. However, contrary to the Examiner's assertions, Shimizu does not teach comparison means for comparing the direction of the motion vector with the **average of the directions of pre-detected motion vectors** in a normal state. Rather, the apparatus of Shimizu compares the direction of the motion vector with a critical prestored direction (column 14, lines 59-67). Only if the calculated motion vector of Shimizu is "approximately the same as the critical direction" (prestored direction) will the apparatus generate an action. Therefore, at least this limitation is not met by Shimizu.

Moreover, claim 1 further requires the step of, "[When it is determined by the comparison means that the direction of the motion vector is offset from the average of the motion vectors ...in the normal state by not less than a predetermined value," then an action is taken, which in this case is that road obstructions are decided. On the other hand, in Shimizu a calculated motion vector is compared with a prestored direction, rather than comparing a calculated motion vector with the average of previously calculated motion vectors, as in the present invention.

Because the above two limitations of claim 1 are not taught or fairly suggested by the cited reference, Applicants respectfully submit that the obviousness rejection is improper and should be withdrawn.

Because claim 3 is dependent from claim 1 and necessarily includes at least its limitations, Applicants respectfully disagree with the rejections thereof, and submit that the rejection thereof is improper as well.

Response under 37 C.F.R. §1.111
Attorney Docket No. 010715
Serial No. 09/873,276

In view of the aforementioned amendments and accompanying remarks, Applicants submit that the claims, as herein amended, are in condition for allowance. Applicants request such action at an early date.

If the Examiner believes that this application is not now in condition for allowance, the Examiner is requested to contact Applicants' undersigned attorney to arrange for an interview to expedite the disposition of this case.

If this paper is not timely filed, Applicants respectfully petition for an appropriate extension of time. The fees for such an extension or any other fees that may be due with respect to this paper may be charged to Deposit Account No. 50-2866.

Respectfully submitted,

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